

EXHIBIT A

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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

This Document Relates to:

Jane Doe LN v. Uber Technologies, Inc., et al., No. 3:24-cv-00120-CRB

Jane Doe TW v. Uber Technologies, Inc., et al., No. 3:24-cv-00559-CRB

Jane Doe DP v. Uber Technologies, Inc., et al., No. 3:24-cv-00573-CRB

Jane Doe LR v. Uber Technologies, Inc., et al., No. 3:24-cv-04306-CRB

Jane Doe BW v. Uber Technologies, Inc., et al., No. 3:24-cv-04308-CRB

Jane Doe ST v. Uber Technologies, Inc., et al., No. 3:24-cv-04309-CRB

Case No. 3:23-md-03084-CRB

DECLARATION OF STEVEN S. SCHULTE IN SUPPORT OF NACHAWATI LAW GROUP PLAINTIFFS' OPPOSITION TO DEFENDANTS UBER TECHNOLOGIES, INC., RASIER, LLC, AND RASIER-CA, LLC'S AMENDED MOTION TO DISMISS CASES FOR FAILURE TO COMPLY WITH PTO 10

Judge: Honorable Charles R. Breyer

Date: December 12, 2025

Time: 10:00 a.m.

Courtroom: 6 – 17th Floor

1 *Jane Doe AR v. Uber Technologies, Inc., et*)
2 *al., No. 3:24-cv-04313-CRB*)
3 *Jane Doe JB v. Uber Technologies, Inc., et*)
4 *al., No. 3:24-cv-04316-CRB*)
5 *Jane Doe VB v. Uber Technologies, Inc., et*)
6 *al., No. 3:24-cv-04317-CRB*)
7 *Jane Doe KH v. Uber Technologies, Inc., et*)
8 *al., No. 3:24-cv-04326-CRB*)
9 *Jane Doe SF v. Uber Technologies, Inc., et*)
10 *al., No. 3:24-cv-04327-CRB*)
11 *Jane Doe SR v. Uber Technologies, Inc., et*)
12 *al., No. 3:24-cv-04332-CRB*)
13 *Jane Doe MC v. Uber Technologies, Inc.,*)
14 *et al., No. 3:24-cv-04334-CRB*)
15 *Jane Doe SG v. Uber Technologies, Inc., et*)
16 *al., No. 3:24-cv-04353-CRB*)
17 *Jane Doe TW v. Uber Technologies, Inc., et*)
18 *al., No. 3:24-cv-04356-CRB*)
19 *Jane Doe VL v. Uber Technologies, Inc., et*)
20 *al., No. 3:24-cv-04357-CRB*)
21 *Jane Doe SW v. Uber Technologies, Inc., et*)
22 *al., No. 3:24-cv-04358-CRB*)
23 *Jane Doe DM v. Uber Technologies, Inc.,*)
24 *et al., No. 3:24-cv-04359-CRB*)
25 *Jane Doe GA v. Uber Technologies, Inc., et*)
26 *al., No. 3:24-cv-04361-CRB*)
27 *Jane Doe SW v. Uber Technologies, Inc., et*)
28 *al., No. 3:24-cv-04364-CRB*)
Jane Doe JG v. Uber Technologies, Inc., et)
al., No. 3:24-cv-04368-CRB)
Jane Doe KY v. Uber Technologies, Inc., et)
al., No. 3:24-cv-04369-CRB)
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1 *Jane Doe DC v. Uber Technologies, Inc., et*)
 2 *al., No. 3:24-cv-04373-CRB*)
 3 *Jane Doe PC v. Uber Technologies, Inc., et*)
 4 *al., No. 3:24-cv-04374-CRB*)
 5 *Jane Doe DB v. Uber Technologies, Inc., et*)
 6 *al., No. 3:24-cv-04428-CRB*)
 7 *Jane Doe (C.A.) v. Uber Technologies,*)
 8 *Inc., et al., No. 3:24-cv-05072-CRB*)
 9 *Jane Doe KC v. Uber Technologies, Inc., et*)
 10 *al., No. 3:24-cv-05073-CRB*)
 11 *Jane Doe RD v. Uber Technologies, Inc., et*)
 12 *al., No. 3:24-cv-05074-CRB*)
 13 *Jane Doe TD v. Uber Technologies, Inc., et*)
 14 *al., No. 3:24-cv-05075-CRB*)
 15 *Jane Doe JH v. Uber Technologies, Inc., et*)
 16 *al., No. 3:24-cv-05079-CRB*)
 17 *Jane Doe JM v. Uber Technologies, Inc., et*)
 18 *al., No. 3:24-cv-05108-CRB*)
 19 *Jane Doe JB v. Uber Technologies, Inc., et*)
 20 *al., No. 3:24-cv-05109-CRB*)
 21 *Jane Doe EB v. Uber Technologies, Inc., et*)
 22 *al., No. 3:24-cv-05110-CRB*)
 23 *Jane Doe AE v. Uber Technologies, Inc., et*)
 24 *al., No. 3:24-cv-05121-CRB*)
 25 *John Doe DG v. Uber Technologies, Inc.,*)
 26 *et al., No. 3:24-cv-05169-CRB*)
 27 *Jane Doe KH v. Uber Technologies, Inc., et*)
 28 *al., No. 3:24-cv-05174-CRB*)
Jane Doe SK v. Uber Technologies, Inc., et)
al., No. 3:24-cv-05710-CRB)
Jane Doe AM v. Uber Technologies, Inc.,)
et al., No. 3:24-cv-05765-CRB)

1 *Jane Doe AR v. Uber Technologies, Inc., et*)
2 *al., No. 3:24-cv-05947-CRB*)
3 *Jane Doe AS v. Uber Technologies, Inc., et*)
4 *al., No. 3:24-cv-05960-CRB*)
5 *Jane Doe CS v. Uber Technologies, Inc., et*)
6 *al., No. 3:24-cv-05964-CRB*)
7 *Jane Doe GT v. Uber Technologies, Inc., et*)
8 *al., No. 3:24-cv-06051-CRB*)
9 *John Doe EW v. Uber Technologies, Inc.,*)
10 *et al., No. 3:24-cv-06073-CRB*)
11 *Jane Doe JD v. Uber Technologies, Inc., et*)
12 *al., No. 3:24-cv-06074-CRB*)
13 *Jane Doe JS v. Uber Technologies, Inc., et*)
14 *al., No. 3:24-cv-06075-CRB*)
15 *Jane Doe SS v. Uber Technologies, Inc., et*)
16 *al., No. 3:24-cv-06076-CRB*)
17 *John Doe-RM v. Uber Technologies, Inc.,*)
18 *et al., No. 3:25-cv-04152-CRB*)
19 *Jane Doe NLG MR v. Uber Technologies,*)
20 *Inc., et al., No. 3:24-cv-07677-CRB*)
21 *Jane Doe NLG-TG v. Uber Technologies,*)
22 *Inc., et al., No. 3:24-cv-07803-CRB*)
23 *Jane Doe NLG-GH v. Uber Technologies,*)
24 *Inc., et al., No. 3:24-cv-08078-CRB*)
25 *Jane Doe NLG-MC v. Uber Technologies,*)
26 *Inc., et al., No. 3:24-cv-08091-CRB*)
27 *Jane Doe NLG VK v. Uber Technologies,*)
28 *Inc., et al., No. 3:24-cv-08610-CRB*)
Jane Doe NLG TJ v. Uber Technologies,)
Inc., et al., No. 3:24-cv-08621-CRB)
Jane Doe NLG JV v. Uber Technologies,)
Inc., et al., No. 3:24-cv-08622-CRB)
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1 *Jane Doe NLG AC v. Uber Technologies,*)
 2 *Inc., et al., No. 3:24-cv-09151-CRB*)
 3 *Jane Doe NLG AB v. Uber Technologies,*)
 4 *Inc., et al., No. 3:24-cv-09188-CRB*)
 5 *Jane Doe NLG PP v. Uber Technologies,*)
 6 *Inc., et al., No. 3:24-cv-09215-CRB*)
 7 *Jane Doe NLG KC v. Uber Technologies,*)
 8 *Inc., et al., No. 3:25-cv-00072-CRB*)
 9 *Jane Doe NLG TT v. Uber Technologies,*)
 10 *Inc., et al., No. 3:25-cv-00075-CRB*)
 11 *John Doe NLG GH v. Uber Technologies,*)
 12 *Inc., et al., No. 3:25-cv-00308-CRB*)
 13 *Jane Doe NLG PO v. Uber Technologies,*)
 14 *Inc., et al., No. 3:25-cv-00358-CRB*)
 15 *Jane Doe NLG LB v. Uber Technologies,*)
 16 *Inc., et al., No. 3:25-cv-00365-CRB*)
 17 *Jane Doe NLG BH v. Uber Technologies,*)
 18 *Inc., et al., No. 3:25-cv-00369-CRB*)
 19 *Jane Doe NLG RC v. Uber Technologies,*)
 20 *Inc., et al., No. 3:25-cv-00371-CRB*)
 21 *Jane Doe NLG BE v. Uber Technologies,*)
 22 *Inc., et al., No. 3:25-cv-00401-CRB*)
 23 *Jane Doe NLG KK v. Uber Technologies,*)
 24 *Inc., et al., No. 3:25-cv-00673-CRB*)
 25 *Jane Doe NLG HK v. Uber Technologies,*)
 26 *Inc., et al., No. 3:25-cv-00675-CRB*)
 27 *Jane Doe NLG JN v. Uber Technologies,*)
 28 *Inc., et al., No. 3:25-cv-00715-CRB*)
Jane Doe NLG AJ v. Uber Technologies,)
Inc., et al., No. 3:25-cv-00717-CRB)
Jane Doe NLG DO v. Uber Technologies,)
Inc., et al., No. 3:25-cv-00718-CRB)
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1 *Jane Doe NLG CM v. Uber Technologies,*
 2 *Inc., et al., No. 3:25-cv-00738-CRB*

3 *Jane Doe NLG KK v. Uber Technologies,*
 4 *Inc., et al., No. 3:25-cv-01068-CRB*

5 *Jane Doe NLG KS v. Uber Technologies,*
 6 *Inc., et al., No. 3:25-cv-01076-CRB*

7 *Jane Doe NLG MS v. Uber Technologies,*
 8 *Inc., et al., No. 3:25-cv-01078-CRB*

9 *Jane Doe NLG AB v. Uber Technologies,*
 10 *Inc., et al., No. 3:25-cv-01079-CRB*

11 *Jane Doe NLG HB v. Uber Technologies,*
 12 *Inc., et al., No. 3:25-cv-01084-CRB*

13 *Jane Doe NLG TS v. Uber Technologies,*
 14 *Inc., et al., No. 3:25-cv-01090-CRB*

15 *Jane Doe NLG KL v. Uber Technologies,*
 16 *Inc., et al., No. 3:25-cv-01265-CRB*

17 *Jane Doe NLG AH v. Uber Technologies,*
 18 *Inc., et al., No. 3:25-cv-01266-CRB*

19 *Jane Doe NLG- CR v. Uber Technologies,*
 20 *Inc., et al., No. 3:25-cv-01716-CRB*

21 *Jane Doe NLG- BH v. Uber Technologies,*
 22 *Inc., et al., No. 3:25-cv-01719-CRB*

23 *Jane Doe NLG- BY v. Uber Technologies,*
 24 *Inc., et al., No. 3:25-cv-01720-CRB*

25 *Jane Doe NLG- HW v. Uber Technologies,*
 26 *Inc., et al., No. 3:25-cv-01725-CRB*

27 *Jane Doe NLG- ZD v. Uber Technologies,*
 28 *Inc., et al., No. 3:25-cv-01729-CRB*

Jane Doe NLG- CP v. Uber Technologies,
Inc., et al., No. 3:25-cv-01731-CRB

Jane Doe NLG- JF v. Uber Technologies,
Inc., et al., No. 3:25-cv-01733-CRB

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1 *Jane Doe NLG- BB v. Uber Technologies,*)
 2 *Inc., et al., No. 3:25-cv-01734-CRB*)
 3 *Jane Doe NLG- AM v. Uber Technologies,*)
 4 *Inc., et al., No. 3:25-cv-01797-CRB*)
 5 *Jane Doe NLG- WB v. Uber Technologies,*)
 6 *Inc., et al., No. 3:25-cv-01799-CRB*)
 7 *Jane Doe NLG- JJ v. Uber Technologies,*)
 8 *Inc., et al., No. 3:25-cv-01804-CRB*)
 9 *Jane Doe NLG- KD v. Uber Technologies,*)
 10 *Inc., et al., No. 3:25-cv-01809-CRB*)
 11 *Jane Doe NLG- RS v. Uber Technologies,*)
 12 *Inc., et al., No. 3:25-cv-01814-CRB*)
 13 *Jane Doe NLG- KG v. Uber Technologies,*)
 14 *Inc., et al., No. 3:25-cv-01816-CRB*)
 15 *Jane Doe NLG- JN v. Uber Technologies,*)
 16 *Inc., et al., No. 3:25-cv-01818-CRB*)
 17 *Jane Doe NLG- DS v. Uber Technologies,*)
 18 *Inc., et al., No. 3:25-cv-01907-CRB*)
 19 *Jane Doe NLG- JD v. Uber Technologies,*)
 20 *Inc., et al., No. 3:25-cv-01909-CRB*)
 21 *Jane Doe NLG- VM v. Uber Technologies,*)
 22 *Inc., et al., No. 3:25-cv-02622-CRB*)
 23 *Jane Doe NLG- BS v. Uber Technologies,*)
 24 *Inc., et al., No. 3:25-cv-02685-CRB*)
 25 *Jane Doe NLG- KM v. Uber Technologies,*)
 26 *Inc., et al., No. 3:25-cv-02706-CRB*)
 27 *Jane Doe NLG- KO v. Uber Technologies,*)
 28 *Inc., et al., No. 3:25-cv-02787-CRB*)
Jane Doe NLG- RR v. Uber Technologies,)
Inc., et al., No. 3:25-cv-02788-CRB)
Jane Doe NLG- AH v. Uber Technologies,)
Inc., et al., No. 3:25-cv-02797-CRB)
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Jane Doe NLG-AV v. Uber Technologies, Inc., et al., No. 3:25-cv-02855-CRB

Jane Doe NLG-KM v. Uber Technologies, Inc., et al., No. 3:25-cv-02856-CRB

Jane Doe NLG-BC v. Uber Technologies, Inc., et al., No. 3:25-cv-02899-CRB

Jane Doe NLG-LB v. Uber Technologies, Inc., et al., No. 3:25-cv-02904-CRB

Jane Doe NLG-PB v. Uber Technologies, Inc., et al., No. 3:25-cv-02938-CRB

Jane Doe NLG-KM v. Uber Technologies, Inc., et al., No. 3:25-cv-02956-CRB

Jane Doe NLG-VT v. Uber Technologies, Inc., et al., No. 3:25-cv-03789-CRB

Jane Doe NLG-EC v. Uber Technologies, Inc., et al., No. 3:25-cv-03794-CRB

Jane Doe NLG-SW v. Uber Technologies, Inc., et al., No. 3:25-cv-04155-CRB

Jane Doe NLG-PL v. Uber Technologies, Inc., et al., No. 3:25-cv-05014-CRB

Jane Doe NLG-PA v. Uber Technologies, Inc., et al., No. 3:25-cv-05096-CRB

Jane Doe NLG-YM v. Uber Technologies, Inc., et al., No. 3:25-cv-05109-CRB

Jane Doe NLG-MH v. Uber Technologies, Inc., et al., No. 3:25-cv-05163-CRB

Et al

DECLARATION OF STEVEN S. SCHULTE

I, Steven S. Schulte, declare as follows:

1. I am an attorney who is admitted *pro hac vice* to practice before this Court. I am a partner at the law firm Nachawati Law Group and counsel of record for the plaintiffs represented by Nachawati Law Group whose claims are the subject of Defendants' Amended Motion to Dismiss. ECF No. 4203.
2. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.
3. This declaration is made in support of Nachawati Law Group Plaintiffs' Opposition to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Amended Motion to Dismiss Cases for Failure to Comply with PTO 10. ECF No. 4203.
4. Despite significant efforts, including numerous phone calls, emails, texts, written letters, and address searches, our office has been unsuccessful in connecting with certain Plaintiffs as to the requisite missing information and/or items that are the subject of Defendants' Motion.
5. The Plaintiffs listed in **Exhibit B** have submitted and produced Plaintiff Fact Sheet Verifications, as of November 5, 2025. Counsel would therefore dispute their inclusion on Uber's list of delinquencies, provided in their Motion, as well as respectfully request for their exclusion on any future entry of dismissal by the Court.
6. Plaintiff Jane Doe NLG VT submitted and produced the Verified Statement of Explanation required by Pretrial Order No. 31 ("PTO 31") on October 27, 2025. Plaintiff Jane Doe NLG LB amended her Ride Information Form on November 3, 2025 to clarify that she did not order the subject ride herself and, under PTO 31, is therefore

1 not required to complete a Verified Statement of Explanation. Accordingly, there are
2 no outstanding PTO 31 issues as to Plaintiffs Jane Doe NLG VT and Jane Doe NLG
3 LB. Counsel would therefore dispute their inclusion on Uber's list of delinquencies for
4 their Motion, as well as respectfully request for their exclusion on any future entry of
5 dismissal by the Court.
6

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct.

9 Executed on November 5, 2025, in Dallas, Texas.

10 **NACHAWATI LAW GROUP**

11 /s/ Steven S. Schulte

12 Steven S. Schulte (TX SBN 24051306)
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